

BNDDUTY,CLOSED

U.S. District Court
Southern District of Florida (Miami)
CRIMINAL DOCKET FOR CASE #: 1:19-mj-03633-LFL-3
Internal Use Only

Case title: USA v. Constantinescu et al

Date Filed: 10/10/2019

Date Terminated: 10/10/2019

Assigned to: Magistrate Judge Lauren
Fleischer Louis

Defendant (3)

Ionela Constantinescu
20646-104
YOB 1983 English
TERMINATED: 10/10/2019
also known as
Pitica
TERMINATED: 10/10/2019

represented by **Hector L. Flores**
Barzee Flores, P.A.
Courthouse Center, Penthouse 1
40 NW Third Street
Miami, FL 33128
305-374-3998
Fax: 379-6668
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LEAD ATTORNEY
ATTORNEY TO BE NOTICED
Designation: CJA Appointment

Pending Counts

None

Disposition

Highest Offense Level (Opening)

None

Terminated Counts

None

Disposition

Highest Offense Level (Terminated)

None

Complaints

WARRANTS/INDICTMENT/SOUTHERN
DISTRICT OF NEW
YORK/CONSPIRACY TO COMMIT
ACCESS DEVICE, WIRE AND BANK
FRAUD; AGGRAVATED IDENTITY
THEFT AND CONSPIRACY TO COMMIT

Disposition

MONEY LAUNDERING

Plaintiff

USA

represented by **Noticing AUSA CR TP/SR**
 Email: Usafls.transferprob@usdoj.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
Designation: Retained

Date Filed	#	Page	Docket Text
10/10/2019	<u>1</u>	3	Magistrate Removal of Warrants/Indictment from the Southern District of New York; Case number in the other District, 19CRIM 651, as to Mircea Constantinescu (1), Alin Hanes Calugaru (2), Ionela Constantinescu (3) and George Serban (4). (cg1) (Entered: 10/10/2019)
10/10/2019	<u>6</u>	28	Minute Order for proceedings held before Magistrate Judge Lauren Fleischer Louis: Initial Appearance as to Ionela Constantinescu held on 10/10/2019. Bond recommendation/set: Ionela Constantinescu (3) \$25K PSB. Date of Arrest or Surrender: 10/10/19. Removal Hearing set for 10/11/2019 1:30 PM in Miami Division before MIA Duty Magistrate. Attorney added: Hector L. Flores for Ionela Constantinescu for Criminal Case CJA representation. Date attorney was appointed CJA: 10/10/19. (Digital 14:20:02) Signed by Magistrate Judge Lauren Fleischer Louis on 10/10/2019. (dgj) Modified on 10/11/2019 (dgj). (Entered: 10/11/2019)
10/10/2019	<u>2</u>	35	ORDER OF REMOVAL ISSUED to the Southern District of New York as to Ionela Constantinescu. Closing Case for Defendant. Signed by Magistrate Judge Lauren Fleischer Louis on 10/10/2019. <i>See attached document for full details.</i> (cg1) (Entered: 10/15/2019)
10/11/2019	<u>7</u>		\$25,000 PSB Bond Entered as to Ionela Constantinescu Approved by Magistrate Judge Lauren Fleischer Louis. <i>Please see bond image for conditions of release.</i> (at) (Additional attachment(s) added on 10/11/2019: # <u>1</u> Restricted Bond with 5th Page) (at). (Entered: 10/11/2019)
		29	<i>Main Document</i>
			<i>Attachment # 1 Restricted Bond with 5th Page (Not Attached)</i>
10/11/2019	<u>8</u>	34	Minute Entry for proceedings held before Magistrate Judge Lauren Fleischer Louis: Removal Hearing as to Ionela Constantinescu held on 10/11/2019. (Digital 13:41:57/15:28:59) (cg1) (Entered: 10/15/2019)

19-3633-MJ-LOUIS

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America
v.
MIRCEA CONSTANTINESCU,
a/k/a "Sobo"

Case No. 19 Cr.

19 CRIM 651

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) MIRCEA CONSTANTINESCU, a/k/a "Sobo"
who is accused of an offense or violation based on the following document filed with the court:

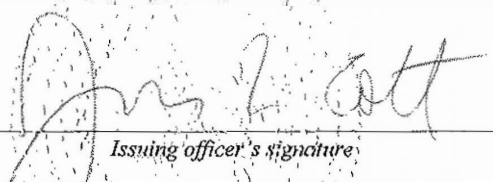
- ☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Conspiracy to commit access device fraud, in violation of Title 18, United States Code, Section 1029(b)(2)
Conspiracy to commit wire fraud and bank fraud, in violation of Title 18, United States Code, Section 1349
Aggravated identity theft, in violation of Title 18, United States Code, Section 1028A
Conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1956(h)

Date: 09/09/2019

City and state: New York, New York



Issuing officer's signature
Hon. James L. Cott, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title

19-3633-MJ-LOUIS

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America
v.
ALIN HANES CALUGARU

Case No. 19 Cr.

19 CRIM 651

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) ALIN HANES CALUGARU
who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Conspiracy to commit access device fraud, in violation of Title 18, United States Code, Section 1029(b)(2)
Conspiracy to commit wire fraud and bank fraud, in violation of Title 18, United States Code, Section 1349
Aggravated identity theft, in violation of Title 18, United States Code, Section 1028A
Conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1956(h)

Date: 09/09/2019

City and state: New York, New York

Issuing officer's signature

Hon. James L. Cott, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title

19-3633-MJ-LOUIS

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America
v.
IONELA CONSTANTINESCU,
a/k/a "Pitica"

Case No. 19 Cr.

19 CRIM 651

*Defendant***ARREST WARRANT**

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) IONELA CONSTANTINESCU, a/k/a "Pitica"

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Conspiracy to commit access device fraud, in violation of Title 18, United States Code, Section 1029(b)(2)
 Conspiracy to commit wire fraud and bank fraud, in violation of Title 18, United States Code, Section 1349
 Aggravated identity theft, in violation of Title 18, United States Code, Section 1028A

Date: 09/09/2019City and state: New York, New York*Issuing officer's signature*Hon. James L. Cott, U.S. Magistrate Judge*Printed name and title***Return**

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____

Date: _____

*Arresting officer's signature**Printed name and title*

19-3633-MJ-LOUIS

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America

v.

George Serban

Case No. 19 Cr.

*Defendant***ARREST WARRANT**

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) GEORGE SERBAN

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
 ☐ Complaint
☐ Probation Violation Petition
☐ Supervised Release Violation Petition
☐ Violation Notice
☐ Order of the Court

This offense is briefly described as follows:

Conspiracy to commit access device fraud, in violation of Title 18, United States Code, Section 1029(b)(2)
 Conspiracy to commit wire fraud and bank fraud, in violation of Title 18, United States Code, Section 1349
 Aggravated identity theft, in violation of Title 18, United States Code, Section 1029A

Date: 09/09/2019*Issuing officer's signature*City and state: New York, New York

Hon. James L. Cott, U.S. Magistrate Judge

*Printed name and title***Return**

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____

Date: _____

*Arresting officer's signature**Printed name and title*

19-3633-MJ-LOUIS

Oct 10, 2019

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - Miami

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MIRCEA CONSTANTINESCU,
a/k/a "Sobo,"
NIKOLAOS LIMBERATOS,
a/k/a "Nicu Limberto,"
CRISTIAN COSTEA,
a/k/a "Momo,"
ALIN HANES CALUGARU,
IONELA CONSTANTINESCU,
a/k/a "Pitica,"
THEOFRASTOS LYMBERATOS,
ANDREW ELIOPOULOS,
VALENTIN PETRESCU,
a/k/a "Gico Cosmin Giscan,"
a/k/a "Zoltan Pruma,"
PETER SAMOLIS,
KELLY KARKI LAM,
GEORGE SERBAN,
DRAGOS DIACONU,
MADLIN ALEXANDRU ANCA,
a/k/a "Mateo Fernandez Alejandro,"
CRISTIAN ULMANU,
a/k/a "Boris Moravec," and
IULIANA MIHAILESCU,

Defendants.

SEALED INDICTMENT

19 Cr.

19 CRIM 651

COUNT ONE

(Conspiracy to Commit Access Device Fraud)

The Grand Jury charges:

OVERVIEW OF THE SCHEME

1. From at least in or about 2014 until at least in or about September 2019, in the Southern District of New York and

elsewhere, MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, IONELA CONSTANTINESCU, a/k/a "Pitica," THEOFRASTOS LYMBERATOS, ANDREW ELIOPOULOS, VALENTIN PETRESCU, a/k/a "Gico Cosmin Giscan," a/k/a "Zoltan Pruma," PETER SAMOLIS, KELLY KARKI LAM, GEORGE SERBAN, DRAGOS DIACONU, MADLIN ALEXANDRU ANCA, a/k/a "Mateo Fernandez Alejandro," CRISTIAN ULMANU, a/k/a "Boris Moravec," and IULIANA MIHAILESCU, the defendants, together with others known and unknown, carried out a wide-ranging scheme as part of a transnational "ATM skimming" organization (the "Skimming Organization"). The Skimming Organization's activities involved, among other things, unlawfully obtaining debit card account information by using advanced technological devices to surreptitiously record victim accountholders' debit card numbers and personal identification numbers at automatic teller machines ("ATMs") and then manufacturing counterfeit and fraudulent debit cards that bear the victim accountholders' account information, which members of the scheme then used to fraudulently withdraw cash from the victim accountholders' bank accounts. This type of scheme is colloquially referred to as "ATM skimming."

2. The defendants' scheme was international in scope, and the defendants carried out hundreds of ATM skimming operations across the United States, including in New York and at least 17

other states. The defendants' scheme defrauded financial institutions and individual victims of more than \$20 million.

3. The defendants assumed various roles in the Skimming Organization. Certain members assisted in receiving packages containing skimming devices or component parts shipped from other parts of the United States and abroad. Other members of the Skimming Organization assisted in engineering the skimming devices that the Organization used. Other members directed or worked in teams deployed across the United States to carry out ATM skimming attacks, casing ideal locations for the attacks, installing skimming devices on ATMs, removing those devices, and cashing out large numbers of fraudulent debit cards manufactured as a result of the skimming operations. Still other members assisted the Skimming Organization in laundering the proceeds of the skimming attacks through bank accounts, properties, businesses, and the transportation of bulk cash.

STATUTORY ALLEGATIONS

4. From at least in or about 2014 until at least in or about September 2019, in the Southern District of New York and elsewhere, MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, IONELA CONSTANTINESCU, a/k/a "Pitica," THEOFRASTOS LYMBERATOS, ANDREW ELIOPOULOS, VALENTIN PETRESCU, a/k/a "Gico Cosmin Giscan," a/k/a "Zoltan Pruma,"

PETER SAMOLIS, KELLY KARKI LAM, GEORGE SERBAN, DRAGOS DIACONU, MADLIN ALEXANDRU ANCA, a/k/a "Mateo Fernandez Alejandro," CRISTIAN ULMANU, a/k/a "Boris Moravec," and IULIANA MIHAILESCU, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit access device fraud, in violation of Title 18, United States Code, Sections 1029(a)(1), (a)(2), (a)(3), (a)(4), and (a)(5).

5. It was a part and an object of the conspiracy that MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, IONELA CONSTANTINESCU, a/k/a "Pitica," THEOFRASTOS LYMBERATOS, ANDREW ELIOPOULOS, VALENTIN PETRESCU, a/k/a "Gico Cosmin Giscan," a/k/a "Zoltan Pruma," PETER SAMOLIS, KELLY KARKI LAM, GEORGE SERBAN, DRAGOS DIACONU, MADLIN ALEXANDRU ANCA, a/k/a "Mateo Fernandez Alejandro," CRISTIAN ULMANU, a/k/a "Boris Moravec," and IULIANA MIHAILESCU, the defendants, and others known and unknown, knowingly and with intent to defraud, as a part of an offense affecting interstate and foreign commerce, would and did produce, use, and traffic in one and more counterfeit access devices, in violation of Title 18, United States Code, Section 1029(a)(1).

6. It was further a part and an object of the conspiracy that MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS,

a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, IONELA CONSTANTINESCU, a/k/a "Pitica," THEOFRASTOS LYMBERATOS, ANDREW ELIOPOULOS, VALENTIN PETRESCU, a/k/a "Gico Cosmin Giscan," a/k/a "Zoltan Pruma," PETER SAMOLIS, KELLY KARKI LAM, GEORGE SERBAN, DRAGOS DIACONU, MADLIN ALEXANDRU ANCA, a/k/a "Mateo Fernandez Alejandro," CRISTIAN ULMANU, a/k/a "Boris Moravec," and IULIANA MIHAILESCU, the defendants, and others known and unknown, knowingly and with intent to defraud, as a part of an offense affecting interstate and foreign commerce, would and did traffic in and use one and more access devices during a one-year period, and by such conduct obtained more than \$1,000 during that period, in violation of Title 18, United States Code, Section 1029(a)(2).

7. It was further a part and an object of the conspiracy that MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, IONELA CONSTANTINESCU, a/k/a "Pitica," THEOFRASTOS LYMBERATOS, ANDREW ELIOPOULOS, VALENTIN PETRESCU, a/k/a "Gico Cosmin Giscan," a/k/a "Zoltan Pruma," PETER SAMOLIS, KELLY KARKI LAM, GEORGE SERBAN, DRAGOS DIACONU, MADLIN ALEXANDRU ANCA, a/k/a "Mateo Fernandez Alejandro," CRISTIAN ULMANU, a/k/a "Boris Moravec," and IULIANA MIHAILESCU, the defendants, and others known and unknown, knowingly and with intent to defraud, as a part of an offense affecting interstate and foreign commerce,

would and did possess fifteen and more devices which were counterfeit and unauthorized access devices, in violation of Title 18, United States Code, Section 1029(a)(3).

8. It was further a part and an object of the conspiracy that MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, IONELA CONSTANTINESCU, a/k/a "Pitica," THEOFRASTOS LYMBERATOS, ANDREW ELIOPOULOS, VALENTIN PETRESCU, a/k/a "Gico Cosmin Giscan," a/k/a "Zoltan Pruma," PETER SAMOLIS, KELLY KARKI LAM, GEORGE SERBAN, DRAGOS DIACONU, MADLIN ALEXANDRU ANCA, a/k/a "Mateo Fernandez Alejandro," CRISTIAN ULMANU, a/k/a "Boris Moravec," and IULIANA MIHAILESCU, the defendants, and others known and unknown, knowingly and with intent to defraud, as a part of an offense affecting interstate and foreign commerce, would and did produce, traffic in, have custody and control of, and possess device-making equipment, in violation of Title 18, United States Code, Section 1029(a)(4).

9. It was further a part and an object of the conspiracy that MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, IONELA CONSTANTINESCU, a/k/a "Pitica," THEOFRASTOS LYMBERATOS, ANDREW ELIOPOULOS, VALENTIN PETRESCU, a/k/a "Gico Cosmin Giscan," a/k/a "Zoltan Pruma," PETER SAMOLIS, KELLY KARKI LAM, GEORGE SERBAN, DRAGOS DIACONU, MADLIN ALEXANDRU ANCA, a/k/a

"Mateo Fernandez Alejandro," CRISTIAN ULMANU, a/k/a "Boris Moravec," and IULIANA MIHAILESCU, the defendants, and others known and unknown, knowingly and with intent to defraud, as a part of an offense affecting interstate and foreign commerce, would and did effect transactions with one and more access devices issued to another person or persons, to receive payment and other things of value during a one-year period the aggregate value of which was equal to and greater than \$1,000, in violation of Title 18, United States Code, Section 1029(a)(5).

OVERT ACTS

10. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about June 26, 2018, MIRCEA CONSTANTINESCU, a/k/a "Sobo," the defendant, shipped a credit card point-of-sale terminal used to fashion skimming devices from a shipping facility in or around Mt. Pocono, Pennsylvania to Veracruz, Mexico.

b. On or about December 5, 2017, NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," the defendant, installed a skimming device on an ATM at a bank located in or around Babylon, New York.

c. On or about June 24, 2018, CRISTIAN COSTEA, a/k/a "Momo," the defendant, during a telephone call with a co-conspirator, discussed perpetrating the scheme by having the co-conspirator send COSTEA skimming equipment.

d. On or about January 7 and 14, 2017, ALIN HANES CALUGARU, the defendant, installed skimming devices on an ATM in or around Canterbury, Connecticut.

e. On or about January 6, 2018, IONELA CONSTANTINESCU, a/k/a "Pitica," the defendant, used fraudulent debit cards to withdraw cash from victim accountholders' bank accounts using ATMs in or around New York, New York.

f. On or about November 11, 2016, THEOFRASTOS LYMBERATOS, the defendant, installed a skimming device on an ATM in or around Manchester, New Hampshire.

g. On or about January 6, 2018, ANDREW ELIOPOULOS, the defendant, used fraudulent debit cards to withdraw cash from victim accountholders' bank accounts using ATMs in or around Glen Cove, Westbury, and Whitestone, New York.

h. On or about June 25, 2017, VALENTIN PETRESCU, a/k/a "Gico Cosmin Giscan," a/k/a "Zoltan Pruma," the defendant, installed and removed a skimming device on and from an ATM in or around Boston, Massachusetts.

i. On or about October 28, 2017, PETER SAMOLIS, the defendant, installed a skimming device on an ATM in or around Queens, New York.

j. On or about July 31 and August 1, 2018, KELLY KARKI LAM, the defendant, during a telephone call with a co-conspirator, discussed perpetrating the scheme by having another co-conspirator deposit funds into her account at a bank that does not require identification for cash deposits and then by withdrawing those funds and transferring them into the account of the co-conspirator on the call.

k. On or about June 18, 2018, GEORGE SERBAN, the defendant, shipped a skimming device from in or around Miami, Florida to Tobyhanna, Pennsylvania.

l. On or about June 2 and 3, 2018, DRAGOS DIACONU, the defendant, used fraudulent debit cards to withdraw cash from victim accountholders' bank accounts using ATMs in or around Chattanooga and Ooltewah, Tennessee.

m. On or about June 2 and 3, 2018, MADLIN ALEXANDRU ANCA, a/k/a "Mateo Fernandez Alejandro," the defendant, used fraudulent debit cards to withdraw cash from victim accountholders' bank accounts using ATMs in or around Chattanooga and Ooltewah, Tennessee.

n. On or about June 20, 2017, CRISTIAN ULMANU, a/k/a "Boris Moravec," the defendant, installed and removed a skimming

device on and from an ATM in or around Somerville, Massachusetts.

o. On or about May 27, 2017, IULIANA MIHAILESCU, the defendant, used fraudulent debit cards to withdraw cash from victim accountholders' bank accounts using ATMs in or around Boston, Brookline, Sturbridge, Brighton, and Natick, Massachusetts.

(Title 18, United States Code, Section 1029(b)(2).)

COUNT TWO
(Conspiracy to Commit Wire Fraud and Bank Fraud)

The Grand Jury further charges:

11. The allegations contained in paragraphs 1, 2, 3 and 10 above are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

12. From at least in or about 2014 until at least in or about September 2019, in the Southern District of New York and elsewhere, MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, IONELA CONSTANTINESCU, a/k/a "Pitica," THEOFRASTOS LYMBERATOS, ANDREW ELIOPOULOS, VALENTIN PETRESCU, a/k/a "Gico Cosmin Giscan," a/k/a "Zoltan Pruma," PETER SAMOLIS, KELLY KARKI LAM, GEORGE SERBAN, DRAGOS DIACONU, MADLIN ALEXANDRU ANCA, a/k/a "Mateo Fernandez Alejandro," CRISTIAN ULMANU, a/k/a "Boris Moravec," and IULIANA MIHAILESCU,

the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343, and bank fraud, in violation of Title 18, United States Code, Section 1344.

13. It was a part and object of the conspiracy that MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, IONELA CONSTANTINESCU, a/k/a "Pitica," THEOFRASTOS LYMBERATOS, ANDREW ELIOPOULOS, VALENTIN PETRESCU, a/k/a "Gico Cosmin Giscan," a/k/a "Zoltan Pruma," PETER SAMOLIS, KELLY KARKI LAM, GEORGE SERBAN, DRAGOS DIACONU, MADLIN ALEXANDRU ANCA, a/k/a "Mateo Fernandez Alejandro," CRISTIAN ULMANU, a/k/a "Boris Moravec," and IULIANA MIHAILESCU, the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

14. It was further a part and object of the conspiracy that MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, IONELA CONSTANTINESCU, a/k/a "Pitica," THEOFRASTOS LYMBERATOS, ANDREW ELIOPOULOS, VALENTIN PETRESCU, a/k/a "Gico Cosmin Giscan," a/k/a "Zoltan Pruma," PETER SAMOLIS, KELLY KARKI LAM, GEORGE SERBAN, DRAGOS DIACONU, MADLIN ALEXANDRU ANCA, a/k/a "Mateo Fernandez Alejandro," CRISTIAN ULMANU, a/k/a "Boris Moravec," and IULIANA MIHAILESCU, the defendants, and others known and unknown, willfully and knowingly, would and did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT THREE
(Aggravated Identity Theft)

The Grand Jury further charges:

15. The allegations contained in paragraphs 1, 2, 3 and 10 above are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

16. From at least in or about 2014 until at least in or about September 2019, in the Southern District of New York and elsewhere, MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, IONELA CONSTANTINESCU, a/k/a "Pitica," THEOFRASTOS LYMBERATOS, ANDREW ELIOPOULOS, VALENTIN PETRESCU, a/k/a "Gico Cosmin Giscan," a/k/a "Zoltan Pruma," PETER SAMOLIS, KELLY KARKI LAM, GEORGE SERBAN, DRAGOS DIACONU, MADLIN ALEXANDRU ANCA, a/k/a "Mateo Fernandez Alejandro," CRISTIAN ULMANU, a/k/a "Boris Moravec," and IULIANA MIHAILESCU, the defendants, and others known and unknown, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), and aided and abetted the same, to wit, the defendants, among other things, engaged in ATM skimming to unlawfully obtain debit card information for victim accountholders (including, but not limited to, the victim

acountholders' names, debit card numbers, and personal identification numbers), created fraudulent debit cards using the stolen victim information, and then used the fraudulent debit cards bearing the victim accountholders' debit card numbers to make millions of dollars in unauthorized withdrawals from the victims accountholders' bank accounts, all during and in relation to the conspiracy to commit access device fraud charged in Count One of this Indictment and the conspiracy to commit wire fraud and bank fraud charged in Count Two of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

COUNT FOUR
(Conspiracy to Commit Money Laundering)

The Grand Jury further charges:

17. The allegations contained in paragraphs 1, 2, 3 and 10 above are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

18. From at least in or about 2014 until at least in or about September 2019, in the Southern District of New York and elsewhere, MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, and KELLY KARKI LAM, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together

and with each other to violate Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), and 1957(a).

19. It was a part and an object of the conspiracy that MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, and KELLY KARKI LAM, the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, cash transactions and wire transfers, represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, the conspiracy to commit access device fraud alleged in Count One of this Indictment, and the conspiracy to commit wire fraud and bank fraud alleged in Count Two of this Indictment, with the intent to promote the carrying on of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

20. It was further a part and an object of the conspiracy that MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, and KELLY KARKI LAM, the defendants, and others known and unknown, in an offense involving interstate and foreign commerce, knowing that the property involved in certain

financial transactions, to wit, cash transactions and wire transfers, represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, the conspiracy to commit access device fraud alleged in Count One of this Indictment, and the conspiracy to commit wire fraud and bank fraud alleged in Count Two of this Indictment, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

21. It was a further part and an object of the conspiracy that MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, and KELLY KARKI LAM, the defendants, and others known and unknown, within the United States, knowingly would and did engage and attempt to engage in monetary transactions in criminally derived property of a value greater than \$10,000 and that was derived from specified unlawful activity, to wit, the conspiracy to commit access device fraud alleged in Count One of this Indictment, and the conspiracy to commit wire fraud and

bank fraud alleged in Count Two of this Indictment, in violation of Title 18, United States Code, Section 1957(a).

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATIONS

22. As a result of committing the offense alleged in Count One of this Indictment, MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, IONELA CONSTANTINESCU, a/k/a "Pitica," THEOFRASTOS LYMBERATOS, ANDREW ELIOPOULOS, VALENTIN PETRESCU, a/k/a "Gico Cosmin Giscan," a/k/a "Zoltan Pruma," PETER SAMOLIS, KELLY KARKI LAM, GEORGE SERBAN, DRAGOS DIACONU, MADLIN ALEXANDRU ANCA, a/k/a "Mateo Fernandez Alejandro," CRISTIAN ULMANU, a/k/a "Boris Moravec," and IULIANA MIHAILESCU, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c)(1)(C), any and all property constituting or derived from, proceeds obtained directly or indirectly, as a result of the commission of said offense, and any and all personal property used or intended to be used to commit said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendants personally obtained and the following specific property:

- a. 200 Asbury Avenue, Westbury, New York;

b. 452 Lafayette Street, Unit C1, Brooklyn, New York; and

c. 569 Putnam Avenue, Brooklyn, New York.

23. As a result of committing the offense alleged in Count Two of this Indictment MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, IONELA CONSTANTINESCU, a/k/a "Pitica," THEOFRASTOS LYMBERATOS, ANDREW ELIOPOULOS, VALENTIN PETRESCU, a/k/a "Gico Cosmin Giscan," a/k/a "Zoltan Pruma," PETER SAMOLIS, KELLY KARKI LAM, GEORGE SERBAN, DRAGOS DIACONU, MADLIN ALEXANDRU ANCA, a/k/a "Mateo Fernandez Alejandro," CRISTIAN ULMANU, a/k/a "Boris Moravec," and IULIANA MIHAILESCU, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(2)(A), any and all property, constituting, or derived from, proceeds obtained directly or indirectly as a result of the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendants personally obtained and the following specific property:

a. 200 Asbury Avenue, Westbury, New York;

b. 452 Lafayette Street, Unit C1, Brooklyn, New York; and

c. 569 Putnam Avenue, Brooklyn, New York.

24. As a result of committing the offense alleged in Count Four of this Indictment, MIRCEA CONSTANTINESCU, a/k/a "Sobo," NIKOLAOS LIMBERATOS, a/k/a "Nicu Limberto," CRISTIAN COSTEA, a/k/a "Momo," ALIN HANES CALUGARU, and KELLY KARKI LAM, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendants personally obtained and the following specific property:

- a. 200 Asbury Avenue, Westbury, New York;
- b. 452 Lafayette Street, Unit C1, Brooklyn, New York; and
- c. 569 Putnam Avenue, Brooklyn, New York.

Substitute Assets Provision

25. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

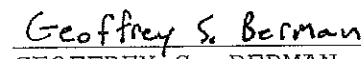
d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 982, and 1029;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


Foreperson


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MIRCEA CONSTANTINESCU, a/k/a "Sobo,"
et al.,

Defendants.

SEALED INDICTMENT

19 Cr. _____

(18 U.S.C. §§ 1028A(a)(1), 1028A(b),
1029(b)(2), 1349, 1956(h), and 2.)

GEOFFREY S. BERMAN

United States Attorney

Foreperson

MINUTE ORDER

Magistrate Judge Lauren F. Louis

Atkins Building Courthouse - 11th Floor

Date: 10/10/2019 Time: 1:30 p.m.

Defendant: 3) IONELA CONSTANTINESCU J#: 20646-104 Case #: 19-3633-MJ-LOUIS SEALED

AUSA: Shane Butland

Attorney:

Violation: S/D/NY/WARR/INDICT/CONSP/COMMIT ACCESS DEVICE
 FRAUD/WIRE FRAUD/BANK FRAUD/AGGRAVATED ID THEFT

Surr/Arrest Date: 10/10/2019 YOB: 1983

Proceeding: Initial Appearance

CJA Appt: Hector Flores, Esq.

Bond/PTD Held: Yes No

Recommended Bond:

Bond Set at:

Co-signed by:

☒ Surrender and/or do not obtain passports/travel docs

Language: English

☒ Report to PTS as directed/or x's a week/month by
 phone: x's a week/month in person

Random urine testing by Pretrial

☐ Services

Treatment as deemed necessary

☐ Refrain from excessive use of alcohol

☐ Participate in mental health assessment & treatment

☒ Maintain or seek full-time employment (can continue to work
 through lift)

☐ No contact with victims/witnesses, except through counsel

☐ No firearms

☐ Not to encumber property

☐ May not visit transportation establishments

☒ Home Confinement/Electronic Monitoring and/or

Curfew pm to am, paid by USPO

☒ Allowances: Medical needs, court appearances, attorney visits,
 employment, transporting children to school

☒ Travel extended to: S/D OF FL; S/D OF N.Y. & E/D OF N.Y.

☒ Other: No employment w/access to credit cards or PII of others

Disposition:

Defendant advised of rights and
 charges

Indictment Unsealed in S/D of N.Y.

Defendant sworn; CJA counsel
 appointed

Govt rec \$25K PSB (Court sets)

Time from today to excluded
 from Speedy Trial Clock

NEXT COURT APPEARANCE

Date:

Time:

Judge:

Place:

Report RE Counsel:

PTD/Bond Hearing:

Removal Hearing:

10/11/19

1:30 p.m.

Duty/Miami

Status Conference RE:

D.A.R. 14:20:02

Time in Court:

40 mins

s/Lauren F. Louis

Magistrate Judge

(Rev. 03/2016)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

APPEARANCE BOND: 19-3633-MJ-Louis

CASE NO.:

UNITED STATES OF AMERICA:

Plaintiff,

JAIL #: 20646-104

v.
Ionela Constantinescu

Defendant,

I, the undersigned defendant and I or we, the undersigned sureties, jointly and severally acknowledge that we and our personal representatives, jointly and severally, are bound to pay the United States of America, the sum of \$ 25,000 PSB.

STANDARD CONDITIONS OF BOND

The conditions of this bond are that the defendant:

1. Shall appear before this court and at such other places as the defendant may be required to appear, in accordance with any and all orders and directions relating to the defendant's appearance in this case, including appearance for violation of a condition of the defendant's release as may be ordered or notified by this court or any other United States District Court to which the defendant may be held to answer or the cause transferred. The defendant is to abide by any judgment entered in such matter by surrendering to serve any sentence imposed and obeying any order or direction in connection with such judgment. This is a continuing bond, including any proceeding on appeal or review, which shall remain in full force and effect until such time as the court shall order otherwise.

2. May not at any time, for any reason whatever, leave the Southern District of Florida or other District to which the case may be removed or transferred after he or she has appeared in such District pursuant to the conditions of this bond, without first obtaining written permission from the court, except that a defendant ordered removed or transferred to another district may travel to that district as required for court appearances and trial preparation upon written notice to the Clerk of this court or the court to which the case has been removed or transferred. The Southern District of Florida consists of the following counties: **Monroe, Miami-Dade, Broward, Palm Beach, Martin, St. Lucie, Indian River, Okeechobee, and Highlands.**

3. May not change his or her present address as recorded on this bond without prior permission in writing from the court.

4. Is required to appear in court at all times as required by notice given by the court or its clerk to the address on this bond or in open court or to the address as changed by permission from the court. The defendant is required to ascertain from the Clerk of Court or defense counsel the time and place of all scheduled proceedings on the case. In no event may a defendant assume that his or her case has been dismissed unless the court has entered an order of dismissal.

5. The defendant must cooperate with law enforcement officers in the collection of a DNA sample if the collection is required by 42 U.S.C. Section 14135a.

6. Shall not commit any act in violation of state or federal laws.

DEFENDANT: Ionela Constantinescu
CASE NUMBER 19-3633-MJ-Louis
PAGE TWO

SPECIAL CONDITIONS OF BOND

In addition to compliance with the previously stated conditions of bond, the defendant must comply with the special conditions checked below:

- ☒ a. Surrender all passports and travel documents, if any, to the Pretrial Services Office and not obtain any travel documents during the pendency of the case;
- ☒ b. Report to Pretrial Services as follows: (☒ as directed or time(s) a week in person and time(s) a week by telephone;
- ☐ c. Submit to substance abuse testing and/or treatment;
- ☐ d. Refrain from excessive use of alcohol, or any use of a narcotic drug or other controlled substance, as defined in section 102 of the Controlled Substances Act (21 U.S.C. §802), without a prescription by a licensed medical practitioner;
- ☐ e. Participate in mental health assessment and/or treatment;
- ☐ f. Participate and undergo a sex offense specific evaluation and treatment;
- ☒ g. Maintain or actively seek full-time employment; can continue to work for Lift.
- ☐ h. Maintain or begin an educational program;
- ☐ i. Avoid all contact with victims of or witnesses to the crimes charged, except through counsel;
- ☐ j. Refrain from possessing a firearm, destructive device or other dangerous weapons;
- ☐ k. None of the signatories may sell, pledge, mortgage, hypothecate, encumber, etc., any property they own until the bond is discharged, or otherwise modified by the Court;
- ☐ l. May not visit commercial transportation establishment: airports, seaport/marinas, commercial bus terminals, train stations, etc.;
- ☐ m. No access to the internet via any type of connectivity device (i.e., computers, pda's, cellular phones, tv's), and follow instructions as outlined in the agreement waiver provided to you by Pretrial Services;
- ☒ n. **HOME CONFINEMENT PROGRAM** The defendant shall participate in one of the following home confinement program components and abide by all the requirements of the program which (☐) will not or (☒) will include electronic monitoring or other location verification system, paid for by the defendant based upon his/her ability to pay (☐) or paid for by Pretrial Services (☒).
- ☐ Curfew: You are restricted to your residence every day from to , or as directed by the Court.
- ☒ Home Detention: You are restricted to your residence at all times except for: (☒) medical needs or treatment, (☒) court appearances, (☒) attorney visits or court ordered obligations, and (☒) other transporting children to school
- ☐ o. **HALFWAY HOUSE PLACEMENT** The defendant shall reside at a halfway house or community corrections center and abide by all the rules and regulations of the program.
- You are restricted to the halfway house at all times except for: (☐) employment; (☐) education; (☐) religious services; (☐) medical, substance abuse, or mental health treatment; (☐) attorney visits; (☐) court appearances; (☐) court ordered obligations; (☐) reporting to Pretrial Services; and (☐) other
- ☒ p. May travel to and from: SDNY and must notify Pretrial Services of travel plans before leaving and upon return.
- ☒ q. Comply with the following additional conditions of bond:
SDFL & EDNY
no access to personal id./credit cards

DEFENDANT:

CASE NUMBER

19-3633-MJ-Lout
lonela Constantinescu

PAGE THREE

PENALTIES AND SANCTIONS APPLICABLE TO DEFENDANT

Violation of any of the foregoing conditions of release may result in the immediate issuance of a warrant for the defendant's arrest, a revocation of release, an order of detention, as provided in 18 U.S.C. §3148, forfeiture of any bail posted, and a prosecution for contempt as provided in 18 U.S.C. §401, which could result in a possible term of imprisonment or a fine.

The commission of any offense while on pretrial release may result in an additional sentence upon conviction for such offense to a term of imprisonment of not more than ten years, if the offense is a felony; or a term of imprisonment of not more than one year, if the offense is a misdemeanor. This sentence shall be consecutive to any other sentence and must be imposed in addition to the sentence received for the offense itself.

Title 18 U.S.C. §1503 makes it a criminal offense punishable by up to five years of imprisonment and a \$250,000 fine to intimidate or attempt to intimidate a witness, juror or officer of the court; 18 U.S.C. §1510 makes it a criminal offense punishable by up to five years of imprisonment and a \$250,000 fine to obstruct a criminal investigation; 18 U.S.C. §1512 makes it a criminal offense punishable by up to ten years of imprisonment and a \$250,000 fine to tamper with a witness, victim or informant; and 18 U.S.C. §1513 makes it a criminal offense punishable by up to ten years of imprisonment and a \$250,000 fine to retaliate against a witness, victim or informant, or threaten to do so.

It is a criminal offense under 18 U.S.C. §3146, if after having been released, the defendant knowingly fails to appear as required by the conditions of release, or to surrender for the service of sentence pursuant to a court order. If the defendant was released in connection with a charge of, or while awaiting sentence, surrender for the service of a sentence, or appeal or certiorari after conviction for:

- (1) an offense punishable by death, life imprisonment, or imprisonment for a term of fifteen years or more the defendant shall be fined not more than \$250,000 or imprisoned for not more than ten years, or both;
- (2) an offense punishable by imprisonment for a term of five years or more, but less than fifteen years, the defendant shall be fined not more than \$250,000 or imprisoned for not more than five years, or both;
- (3) any other felony, the defendant shall be fined not more than \$250,000 or imprisoned not more than two years, or both;
- (4) a misdemeanor, the defendant shall be fined not more than \$100,000 or imprisoned not more than one year, or both.

A term of imprisonment imposed for failure to appear or surrender shall be consecutive to the sentence of imprisonment for any other offense. In addition, a failure to appear may result in the forfeiture of any bail posted, which means that the defendant will be obligated to pay the full amount of the bond, which may be enforced by all applicable laws of the United States.

DEFENDANT: Lonela Constantinescu
CASE NUMBER 19-3633-MJ-Louis
PAGE FOUR

PENALTIES AND SANCTIONS APPLICABLE TO SURETIES

Violation by the defendant of any of the foregoing conditions of release will result in an immediate obligation by the surety or sureties to pay the full amount of the bond. Forfeiture of the bond for any breach of one or more conditions may be declared by a judicial officer of any United States District Court having cognizance of the above entitled matter at the time of such breach, and if the bond is forfeited and the forfeiture is not set aside or remitted, judgment may be entered upon motion in such United States District Court against each surety jointly and severally for the amount of the bond, together with interest and costs, and execution may be issued and payment secured as provided by the Federal Rules of Criminal Procedure and other laws of the United States.

SIGNATURES

I have carefully read and I understand this entire appearance bond consisting of four pages, or it has been read to me, and, if necessary, translated into my native language, and I know that I am obligated by law to comply with all of the terms of this bond. I promise to obey all conditions of this bond, to appear in court as required, and to surrender for service of any sentence imposed. I am aware of the penalties and sanctions outlined in this bond for violations of the terms of the bond.

If I am an agent acting for or on behalf of a corporate surety, I further represent that I am a duly authorized agent for the corporate surety and have full power to execute this bond in the amount stated.

NOTE: Page 5 of this form MUST be completed before the bond will be accepted for filing.

DEFENDANT

Signed this 19th day of Oct, 20 19 at Miami, Florida
Signed and acknowledged before me: DEFENDANT: (Signature) [Signature]
Miami City FL State

Witness

CORPORATE SURETY

Signed this _____ day of _____, 20 ____ at _____, Florida
SURETY: _____ AGENT: (Signature) _____

City State PRINT NAME: _____

INDIVIDUAL SURETIES

Signed this _____ day of _____, 20 ____ at _____, Florida	Signed this _____ day of _____, 20 ____ at _____, Florida
SURETY: (Signature) _____	SURETY: (Signature) _____
PRINT NAME: _____	PRINT NAME: _____
RELATIONSHIP TO DEFENDANT: _____	RELATIONSHIP TO DEFENDANT: _____
_____ City State	_____ City State
Signed this _____ day of _____, 20 ____ at _____, Florida	Signed this _____ day of _____, 20 ____ at _____, Florida
SURETY: (Signature) _____	SURETY: (Signature) _____
PRINT NAME: _____	PRINT NAME: _____
RELATIONSHIP TO DEFENDANT: _____	RELATIONSHIP TO DEFENDANT: _____
_____ City State	_____ City State

APPROVAL BY THE COURT

Date: 10/10/19

LAUREN F. LOUIS
UNITED STATES MAGISTRATE JUDGE

**United States District Court
Southern District of Florida**

Case Number: 19-3633-MT-Louis

SUPPLEMENTAL ATTACHMENT(S)

Please refer to supplemental paper "court file" in the division where the Judge is chambered. These attachments must not be placed in the "chron file".

Documents Retained in Supplemental Case Files (Scanned or Not Scanned)

Civil Case Documents

- ☐ • Handwritten documents/pleadings (i.e., pro se)
- ☐ • Poor quality scanned images
- ☐ • Photographs
- ☐ • CD, DVD, VHS tapes, cassette tapes
- ☐ • Surety bonds
- ☐ • Exhibits that cannot be scanned (e.g., objects)
- ☐ • Bound extradition papers
- ☐ • Jury verdict
- ☐ • Jury notes (unredacted)
- ☐ • Jury selection materials (seating charts, challenges, etc.)

Criminal Case Documents

- ☐ • Handwritten documents/pleadings (i.e., pro se)
- ☐ • Poor quality scanned images
- ☐ • Photographs
- ☐ • CD, DVD, VHS Tape, Cassette Tapes
- ☒ • Bond documentation (Pg. 5 of bond – Personal Info)
- ☐ • Exhibits
- ☐ • Indictments
- ☐ • Arrest warrants
- ☐ • Jury verdict
- ☐ • Jury notes (unredacted)
- ☐ • Jury selection materials (seating charts, challenges, etc.)

Date: 10110119

MINUTE ORDER

Page 17

Magistrate Judge Lauren F. Louis

Atkins Building Courthouse - 11th Floor

Date: 10/11/2019 Time: 1:30 p.m.

Defendant: 3) IONELA CONSTANTINESCU J#: (B) Case #: 19-3633-MJ-LOUIS

AUSA: Lindsey Friedman/Silverman/Rothchild Attorney: HECTOR FLORES (CJA)

Violation: S/D/NY/WARR/INDICT/COMMIT ACCESS DEVICE FRAUD/WIRE FRAUD/BANK FRAUD/AGGRAVATED ID THEFT Surr/Arrest Date: YOB: 1983

Proceeding: Removal Hearing CJA Appt: _____

Bond/PTD Held: ☒ Yes ☐ No Recommended Bond: _____

Bond Set at: \$25K PSB Co-signed by: _____

☐ Surrender and/or do not obtain passports/travel docs

Language: English

☐ Report to PTS as directed/or _____ x's a week/month by phone: _____ x's a week/month in person

Random urine testing by Pretrial

☐ Services _____

Treatment as deemed necessary

☐ Refrain from excessive use of alcohol☐ Participate in mental health assessment & treatment☐ Maintain or seek full-time employment/education☐ No contact with victims/witnesses, except through counsel☐ No firearms☐ Not to encumber property☐ May not visit transportation establishments☐ Home Confinement/Electronic Monitoring and/or

Curfew _____ pm to _____ am, paid by _____

☐ Allowances: Medical needs, court appearances, attorney visits, religious, employment☐ Travel extended to: _____☐ Other: _____

Disposition:

Removal hearing held; Detective

Frank Cleri, TFO/Violent Crimes

sworn and testified; Gov't's exhibit #1

admitted; the Gov't did prove that

this is the Defendant named in the

Indictment

Defendant to appear in the S/D of

N.Y. on 10/24/19 at 10:30 a.m.

before Judge Swain; Order of

Removal executed

Time from today to _____ excluded from Speedy Trial Clock

NEXT COURT APPEARANCE

Date:

Time:

Judge:

Place:

Report RE Counsel: _____

PTD/Bond Hearing: _____

Prelim/Arraign or Removal: _____

Status Conference RE: _____

D.A.R. 13:41:57/15:28:59

Time in Court: 30 mins

s/Lauren F. Louis

Magistrate Judge

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 19-3633-MJ-LOUIS**

United States of America
Plaintiff,

v.

IONELA CONSTANTINESCU,
Defendant.


_____/

ORDER OF REMOVAL

It appearing that in the **SOUTHERN DISTRICT OF NEW YORK**, an Indictment was filed against the above-named defendant on a charge of **CONSPIRACY TO COMMIT ACCESS DEVICE FRAUD/WIRE FRAUD/BANK FRAUD/AGGRAVATED IDENTITY THEFT**, and that the defendant was arrested in the Southern District of Florida and was given a hearing before United States Magistrate Judge Lauren F. Louis at Miami, Florida, which officially committed the defendant for removal to the **SOUTHERN DISTRICT OF NEW YORK**, it is ORDERED AND ADJUDGED that the defendant be removed to the above-named district for trial on said charge.

And it further appearing that the defendant waived further hearing in the said removal proceedings and was held by the Magistrate Judge Lauren F. Louis for removal and posted bail in the amount of \$ **25,000.00 Personal Surety** which was approved by the United States Magistrate Judge Lauren F. Louis, and it is further ORDERED that the defendant shall appear in the aforesaid district at such times and places as may be ordered by that District Court, in accordance with the terms and conditions of aforesaid bond furnished by the defendant, and it is further ORDERED that the funds, plus interest, which may have been deposited on behalf of this defendant with the Clerk of the Court under Bail Reform Act be transferred to the district where removed.

DONE AND ORDERED at Miami, Florida on 10/10/2019.



Lauren F. Louis
United States Magistrate Judge